

Exhibit A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence

I. U.S. Patent No. 10,028,144

Term No.	Claim Term	Headwater’s Proposed Construction and Supporting Evidence	Samsung’s Proposed Construction and Preliminary Evidence
1	“protected execution partition”	<p>Plain and ordinary meaning, an example of which is an execution partition that cannot be accessed without authorization</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> <i>See generally</i> ’144 patent; <i>see also id.</i> at Abstract, 4:10-34, 6:25-46, 8:14-37, 8:52-10:2, 16:16-25, Figs. 1-11 and associated written description; claims 1-4, 14-17</p> <p><u>Extrinsic Evidence</u> IPR2025-00963 and related pleadings / filings / declarations</p> <p><i>Headwater Rsch. LLC v. AT&T Inc. et al.</i>, Case No. 2:23-cv-00397 (E.D. Tex.), Markman Order (Dkt. 97) and related pleadings / filings / declarations; including definitions and evidence regarding term “protected partition”</p>	<p>“an execution partition that cannot be accessed without authorization”</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence:</u> ’025 patent at Abstract, 3:29–47, 5:55–6:11, 6:25–46, 6:61–8:13, 11:11–63, 13:3–30, 17:25–18:64, 19:7–27, and associated Figures; Figs. 1–11, and associated text; cls. 1, 2, 14, 15, 17.</p> <p><u>Extrinsic Evidence:</u> <i>See Headwater Rsch. LLC v. AT&T Inc. et al.</i>, Case No. 2:23-cv-00397 (E.D. Tex.), Dkt. Nos. 67, 70, 78, 83, 85, 88, 97, 106; <i>Headwater Rsch. LLC v. T-Mobile US, Inc. et al.</i>, Case No. 2:23-cv-00379 (E.D. Tex.), Dkt. Nos. 70, 90, 94, 95, 100, 105, 113, 139, 146, 147, 157; <i>Headwater Rsch. LLC v. Verizon Commc’ns Inc. et al.</i>, Case No. 2:23-cv-00352 (E.D. Tex.), Dkt. Nos. 78, 92, 96, 97, 102, 107, 112, 140, 148, 149, 158, 376.</p>

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Preliminary Evidence
			Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.
2	"agent"	<p>Plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> <i>See generally</i> '144 patent; <i>see also id.</i> at Abstract, 2:41-3:8, 3:29-4:22, 4:52-5:41, 5:55-6:11, 6:25-7:64, 8:14-37, 8:52-13:63, 14:8-17:58, Figs. 1-11 and associated written description; claims 1-18</p> <p><u>Extrinsic Evidence</u> IPR2025-00963 and related pleadings / filings / declarations</p> <p><i>Headwater v. Samsung</i>, No. 2:23-cv-00103-JRG-RSP (E.D. Tex.), Markman Order (Dkt. 118) and related pleadings / filings / declarations; including definitions and evidence regarding term "agent"</p> <p>Headwater reserves the right to rely upon any evidence cited by and/or relied upon by Samsung.</p>	<p>"a piece of software that performs certain functions for other software"</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence:</u> '144 patent at Abstract, 2:41-3:8, 3:29-4:22; 4:52-5:41, 5:55-6:11, 6:25-7:64, 8:14-37, 8:52-11:18, 11:28-36, 11:47-13:17, 13:54-63, 14:8-15:8, 15:30-17:16, 17:25-58; Figs. 1-11, and associated texts; cls. 1-7, 10-13, 15, 17-18</p> <p>14/948,065 prosecution history 13/737,748 prosecution history 12/694,445 prosecution history 12/380,780 prosecution history</p> <p><u>Extrinsic Evidence:</u> Newton's Telecom Dictionary, 24th ed. (2008) at 95; Dictionary of Science and Technology, 2nd ed. (2007) at 20; Dictionary of Computer and Internet Terms, 10th ed. (2009) at 15; U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Microsoft Press Computer Dictionary (3d ed. 1997): definition for "agent";</p>

Term No.	Claim Term	Headwater’s Proposed Construction and Supporting Evidence	Samsung’s Proposed Construction and Preliminary Evidence
			<p><i>Headwater Rsch. LLC v. Samsung Elecs. Am., Inc. et al.</i>, Case No. 2:23-cv-00103-JRG-RSP (E.D. Tex.); Dkt. Nos. 91, 94, 96, 99, 101, 105, 108, 118, 126, 148 (and the <i>Markman</i> hearing transcript).</p> <p>Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.</p>
3	“device agent”	<p>Plain and ordinary meaning, an example of which is a piece of software on the end-user device that performs certain functions for other software</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> See Intrinsic Evidence for Term #2</p> <p><u>Extrinsic Evidence</u> IPR2025-00963 and related pleadings / filings / declarations</p> <p><i>Headwater v. Samsung</i>, No. 2:23-cv-00103-JRG-RSP (E.D. Tex.), Markman Order (Dkt. 118) and related pleadings / filings / declarations; including definitions and evidence regarding term “device agents”</p>	<p>“a piece of software on the end-user device that performs certain functions for other software”</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence:</u> '144 patent at Abstract, 2:41–3:8, 3:29–4:22; 4:52–5:41, 5:55–6:11, 6:25–7:64, 8:14–37, 8:52–11:18, 11:28–36, 11:47–13:17, 13:54–63, 14:8–15:8, 15:30–17:16, 17:25–58; Figs. 1–11, and associated texts; cls. 1–7, 10–13, 15, 17–18</p> <p>14/948,065 prosecution history 13/737,748 prosecution history 12/694,445 prosecution history 12/380,780 prosecution history</p> <p><u>Extrinsic Evidence:</u></p>

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Preliminary Evidence
		Headwater reserves the right to rely upon any evidence cited by and/or relied upon by Samsung.	<p>Newton's Telecom Dictionary, 24th ed. (2008) at 95; Dictionary of Science and Technology, 2nd ed. (2007) at 20; Dictionary of Computer and Internet Terms, 10th ed. (2009) at 15; U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Microsoft Press Computer Dictionary (3d ed. 1997): definition for "agent"; <i>Headwater Rsch. LLC v. Samsung Elecs. Am., Inc. et al.</i>, Case No. 2:23-cv-00103-JRG-RSP (E.D. Tex.), Dkt. Nos. 91, 94, 96, 99, 101, 105, 108, 118, 126, 148 (and the <i>Markman</i> hearing transcript).</p> <p>Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.</p>

II. U.S. Patent No. 10,080,250

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Preliminary Evidence
4	"secure policy information"	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '250 patent at Abstract, 4:1-5:10, 6:34-7:63, 8:20-9:2, 10:3-11:4, 12:4-22,</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence:</u></p>

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Preliminary Evidence
		<p>13:36-16:5, 18:30-52, 19:11-21:35, 22:18-28:6, 28:45-31:27, 32:44-40:33, 40:66-41:38, 41:52-59, 43:20-44:12, 46:6-47:4, 48:17-26; Figs. 1-25 and exemplary associated written description; claims 1-2</p> <p><u>Extrinsic Evidence</u> IPR2025-00932 and related pleadings / filings / declarations</p> <p>Headwater reserves the right to rely upon any evidence cited by and/or relied upon by Samsung.</p>	<p>'250 patent at Abstract, 1:7-29, 1:30-3:30, 3:31-48:60, 48:61-49:21, 49:23-50:26</p> <p>15/287,603 prosecution history 14/578,124 prosecution history 13/248,028 prosecution history 12/380,778 prosecution history 12/380,780 prosecution history 61/387,243 prosecution history 61/206,354 prosecution history 61/206,944 prosecution history 61/207,393 prosecution history 61/207,739 prosecution history</p> <p><u>Extrinsic Evidence:</u></p> <p>Declaration of Dr. Dan Schonfeld</p> <p>Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.</p>
5	“application-specific execution environment policy”	<p>Not indefinite; plain and ordinary meaning</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u> '250 patent at Abstract, 4:12-46, 5:35-7:28, 8:41-9:54, 10:21-11:55, 12:49-14:26, 16:6-17:13, 18:3-52,19:43-63, 20:23-22:17, 25:53-</p>	<p>Indefinite.</p> <p><u>Intrinsic Evidence:</u></p> <p>'250 patent at Abstract, 1:7-29, 1:30-3:30, 3:31-48:60, 48:61-49:21, 49:23-50:26</p> <p>15/287,603 prosecution history</p>

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		<p>40:44, 41:52-43:19, 44:22-33, 46:6-47:4, 48:5-31; Figs. 1-25 and exemplary associated written description; claims 1-2.</p> <p><u>Extrinsic Evidence</u> IPR2025-00932 and related pleadings / filings / declarations</p> <p>Headwater reserves the right to rely upon any evidence cited by and/or relied upon by Samsung.</p>	<p>14/578,124 prosecution history 13/248,028 prosecution history 12/380,778 prosecution history 12/380,780 prosecution history 61/387,243 prosecution history 61/206,354 prosecution history 61/206,944 prosecution history 61/207,393 prosecution history 61/207,739 prosecution history</p> <p><u>Extrinsic Evidence:</u></p> <p>Declaration of Dr. Dan Schonfeld</p> <p>Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.</p>
6	“configurable communication security policy”	<p>Not indefinite; plain and ordinary meaning</p> <p><u>Intrinsic Evidence</u></p> <p>’250 patent at Abstract, 4:1-5:10, 6:34-7:46, 8:20-9:2, 10:3-11:4, 12:4-22, 13:36-16:5, 19:11-21:35, 22:18-28:6, 30:47-31:27; 32:44-40:33, 40:66-41:38, 41:52-59, 43:20-44:12, 46:6-47:4, 48:17-35; Figs. 1-25 and exemplary associated written description; claims 1-2.</p>	<p>Indefinite.</p> <p><u>Intrinsic Evidence:</u></p> <p>’250 patent at Abstract, 1:7-29, 1:30-3:30, 3:31-48:60, 48:61-49:21, 49:23-50:26</p> <p>15/287,603 prosecution history 14/578,124 prosecution history 13/248,028 prosecution history 12/380,778 prosecution history 12/380,780 prosecution history</p>

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		<p><u>Extrinsic Evidence</u> IPR2025-00932 and related pleadings / filings / declarations</p> <p>Headwater reserves the right to rely upon any evidence cited by and/or relied upon by Samsung.</p>	<p>61/387,243 prosecution history 61/206,354 prosecution history 61/206,944 prosecution history 61/207,393 prosecution history 61/207,739 prosecution history</p> <p><u>Extrinsic Evidence:</u></p> <p>Declaration of Dr. Dan Schonfeld</p> <p>Samsung reserves the right to rely upon any evidence cited by and/or relied upon by Headwater.</p>